UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

CASE NO. 1:06-CV-02658-WMN

STEVEN A. SILVERS, an individual,

Plaintiff,

v.

GOOGLE INC., a Delaware corporation,

Defendant.

_______________________________________/

US District Court for the
Southern District of Florida
West Palm Beach Division

Case No. 05-80387-CIV-
RYSKAMP/VITUNAC

STELOR PRODUCTIONS, LLC'S NOTICE OF FILING PROPOSED ORDER GRANTING MOTION TO COMPEL AND OBJECTION TO PROPOSED ORDER SUBMITTED BY MS. MILLER

Stelor Productions, LLC ("Stelor"), by and through undersigned counsel, hereby submits a proposed form of Order Granting Stelor's Motion to Compel Ms. Miller to Comply with Subpoena and Court Order. Stelor respectfully suggests that the attached Order accurately reflects the Court's rulings at the December 19, 2006 telephonic conference, and requests that it be entered.

Stelor objects to the form of order submitted by Ms. Miller. It does NOT accurately reflect the Court's rulings. Specifically, the form improperly provides that the taking of the deposition is subject to certain conditions. The Court did NOT condition the taking of the deposition in any way. In addition, the form improperly states that Stelor's request for sanctions was denied. It was not; the Court reserved ruling on sanctions pending completion of the deposition.

WHEREFORE, Stelor respectfully requests that the form of order attached hereto be entered.

Dockets.Justia.com

Respectfully submitted,

BURLINGTON, SCHWIEP,
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s/ Kevin C. Kaplan
Kevin C. Kaplan

cc: Jay L. Cohen, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2006, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Kevin C. Kaplan
Kevin C. Kaplan

SERVICE LIST

STEVEN A. SILVERS, Plaintiff, v. GOOGLE INC.
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UNITED STATES DISTRICT COURT, DISTRICT OF MARYLAND

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